

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re: John Connell Rooney and Delores Marie Rooney
Debtors

CASE NO: 12-31859-SVK-13

NATIONSTAR MORTGAGE LLC, its successors, servicing agents, and/or assigns

Vs.

NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY AND ABANDONMENT

JOHN CONNELL ROONEY AND DELORES MARIE ROONEY
AND MARY B. GROSSMAN, TRUSTEE

NATIONSTAR MORTGAGE LLC, its successors, servicing agents, and/or assigns

(hereinafter referred to as "Movant") by its attorneys Blommer Peterman, S.C., has filed papers to request that the Court grant it relief from the automatic stay imposed by Sec. 362(a) of the Bankruptcy Code and for abandonment of property of the estate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought by the Movant in this Motion, or if you want the Court to consider your views on this Motion, then, **within fourteen (14) days of the date of this Notice**, you or your attorney must file a written objection with the Court and request a hearing. Your objection must be sent to:

Bankruptcy Clerk of Court
US Courthouse
517 E. Wisconsin Avenue
Milwaukee, WI 53202

Blommer Peterman S.C. 165 Bishops Way, Suite 100
Brookfield, WI 53005 262-790-5719 shannon@blommerpeterman.com

If you mail your objection and request for hearing to the Court for filing, you must mail it early enough so that the Court will receive it within fourteen (14) days of the date of this Notice.

You must also mail a copy of your objection and request for hearing to Movant's

Attorney:

Shannon K. Cummings
Blommer Peterman, S.C.
165 Bishops Way, Suite 100
Brookfield, WI 53005

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief and abandonment as requested.

Dated this 6 day of June, 2014

Blommer Peterman, S.C.

/s/

By: Shannon K. Cummings

Prepared By:
Shannon K. Cummings
Blommer Peterman, S.C.
165 Bishops Way, Suite 100
Brookfield, WI 53005
262-790-5719
shannon@blommerpeterman.com

Blommer Peterman, S.C. is the creditor's attorney and is attempting to collect a debt on its client's behalf, and any information obtained will be used for that purpose.

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MOTION FOR RELIEF FROM AUTOMATIC
STAY AND ABANDONMENT

JOHN CONNELL ROONEY AND DELORES MARIE ROONEY
AND MARY B. GROSSMAN, TRUSTEE

NATIONSTAR MORTGAGE LLC, its successors, servicing agents and/or assigns (hereinafter referred to as Movant) by and through its attorneys, Blommer Peterman, S.C., moves the court pursuant to Sec. 362(d) and Sec. 554 (b) of the Bankruptcy Code for an order granting it relief from the automatic stay that was imposed by Sec. 362(a) of the Bankruptcy Code and for an Order of abandonment and herein alleges as follows:

1. John Connell Rooney and Delores Marie Rooney, (Debtors) filed a petition under Chapter 13 on August 8, 2012.
2. On October 25, 2006, Debtors executed a promissory Note evidencing a mortgage loan. The promissory Note is secured by a perfected Mortgage on the real property owned by the Debtors located at 1218 Appaloosa Tr, Racine, WI 53402-0000. A copy of said secured Mortgage is attached hereto and incorporated herein by reference and/or documents revealing the current mortgagee of record.

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3. That monthly Mortgage payments have not been received on the above referenced mortgage loan as required by the terms of the Debtors proposed Plan in this case thereby constituting just cause for terminating the automatic stay that has been imposed.
4. The Debtors mortgage loan is currently in default and is reflecting post-petition arrearages as follows:

13 Payments of \$1,659.62	June 1, 2013 to June 1, 2014	\$21,575.06
Filing Cost		\$176.00
Attorney Fees		\$650.00
Less Suspense Balance		(\$248.94)
Grand Total		\$22,152.12

5. The assessed value of the property is \$224,700.00 according to information provided on behalf of the Treasurer, and the Debtors' Payoff on said mortgage loan good through June 4, 2014 is estimated to be \$211,758.22.
6. The real estate property tax balance showing due on the subject property at this time is \$0.00.
7. The Movant needs to be provided with current proof that adequate homeowner's insurance is in effect on the subject property and that the Movant is properly shown as an additional insured.
8. If the Movant is not granted the relief described herein then it will suffer injuries, losses and/or damages as it does not have adequate protection from the Debtors with regard to its secured interest in the subject property.

9. Should the Movant be granted the relief requested in this Motion, any Order granting the requested relief shall take effect immediately thereby waiving the 14 day stay as described by Bankruptcy Rule 4001 (a)(3).
10. Based on the preceding allegations, the subject property is burdensome to the estate and is of inconsequential value and benefit to the estate.
11. If this Motion is granted, the Movant will withdraw its proof of claim. If the proof of claim is withdrawn, the Movant should no longer be required to provide the notices required by Bankruptcy Rule 3002.1.

WHEREFORE, Movant requests:

1. Pursuant to Sec. 362(d)(1) of the Bankruptcy Code, an Order for Relief from the automatic stay as it pertains to the Debtors and the subject property of the estate based on just cause being shown thereby allowing Movant to exercise and enforce its rights pursuant to said Note and Mortgage.
2. Pursuant to Sec. 554 (b) of the Bankruptcy Code, an Order that the Trustee has abandoned the estate's interest in the subject property.
3. Upon withdrawal of its proof of claim, Movant should no longer be required to provide the notices required by Bankruptcy Rule 3002.1.
4. That the Movant's legal fees and costs associated with this Motion be approved.
5. That any Order entered pursuant to this Motion shall take effect immediately upon its entry thereby waiving the 14 day stay as described by Bankruptcy Rule 4001 (a)(3).

6. Any further relief that the Court may deem just and equitable.

Dated this 10 day of June, 2014

Blommer Peterman, S.C.

/s/



By: Shannon K. Cummings

Blommer Peterman, S.C.
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Brookfield, WI 53005
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AFFIDAVIT OF SERVICE

STATE OF WISCONSIN)
WAUKESHA COUNTY)

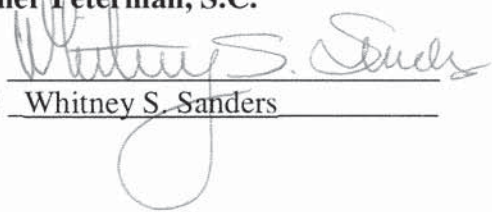
The affiant, being first duly sworn on oath, deposes and states that a copy of the Notice of Motion and Motion for Relief and Abandonment in the above entitled action was served on June 12, 2014 by Electronic Case Filing to the following persons at the following addresses:

Mary B. Grossman, Trustee
P.O. Box 510920
Milwaukee, WI 53203


Office of the U.S. Trustee - Eastern
517 East Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Attorney Andrew M. Golanowski
55 E. Monroe Street #3400
Chicago, IL 60603

Blommer Peterman, S.C.


Name: Whitney S. Sanders

Subscribed and sworn to before me this
12th day of June, 2014


Notary Public, State of Wisconsin
My commission expires: 8/16/2015



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AFFIDAVIT OF SERVICE

STATE OF WISCONSIN)
WAUKESHA COUNTY)

The affiant, being first duly sworn on oath, deposes and states that a copy of the Notice of Motion and Motion for Relief and Abandonment in the above entitled action was served on June 12, 2014 by first class mail, postage prepaid, to the following persons at the following addresses:

John Connell Rooney
1915 Wustum Avenue
Racine, WI 53404

Delores Marie Rooney
2719 LaSalle Street
Racine, WI 53402

Attorney Andrew M. Golanowski
55 E. Monroe Street #3400
Chicago, IL 60603

*** Please see attached pages for additional Creditors if needed ***

Blommer Peterman, S.C.

Name: Marissa Steinberg
Legal Assistant

Subscribed and sworn to before me this
12 day of June, 2014

[Signature]
Notary Public, State of Wisconsin
My commission expires: 7/24/16



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Brookfield, WI 53005 262-790-5719 shannon@blommerpeterman.com

**American Express Bank
FSB**

c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

**AMERICAN HONDA
FINANCE
CORPORATION
NATIONAL
BANKRUPTCY CENTER
P.O. BOX 168088
IRVING, TX 75016-8088**

AMEX
Attn: Bankruptcy Dept.
Po Box 297871
Fort Lauderdale, FL 33329

Bank of America, N.A.
P.O. Box 660933
Dallas, TX 75266-0933

Bank of America, N.A.
Attn: Bankruptcy Dept.
450 American St
Simi Valley, CA 93065

Best Buy
Bankruptcy Department
PO Box 5238
Carol Stream, IL 60197-5238

CAP1/Menards
Attn: Bankruptcy Dept.
Po Box 5253
Carol Stream, IL 60197

Capital One
Attn: Bankruptcy Dept.
Po Box 85520
Richmond, VA 23285

Capital One NA
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

Capital One, N.A.
Bass & Associates, P.C.
3936 E. Ft. Lowell Road,
Suite #200
Tucson, AZ 85712

CBE Group
Attn: Bankruptcy Dept.
131 Towe Park Dr Suite 1
Waterloo, IA 50702

Chase
Attn: Bankruptcy Dept.
Po Box 15298
Wilmington, DE 19850

Citgo/CBNA
Attn: Bankruptcy Dept.
Po Box 6497
Sioux Falls, SD 57117

Credit First N
Attn: Bankruptcy Dept.
6275 Eastland Rd
Brookpark, OH 44142

Credit First NA
PO Box 818011
Cleveland OH 44181

Discover
Attn: Bankruptcy Dept.
Po Box 15316
Wilmington, DE 19850

Discover Bank
DB Servicing Corporation
PO Box 3025
New Albany, OH 43054-3025

**eCAST Settlement
Corporation**
c/o Bass & Associates, P.C.
3936 E Ft. Lowell, Suite 200
Tucson, AZ 85712

Equifax
Attn: Bankruptcy Dept.
PO Box 740241
Atlanta, GA 30374

Experian
Attn: Bankruptcy Dept.
PO Box 2002
Allen, TX 75013

Exxon Mobil/Citi
Attn: Bankruptcy Dept.
Po Box 6497
Sioux Falls, SD 57117

Falls Collection SVC
Attn: Bankruptcy Dept.
Po Box 668
Germantown, WI 53022

Gecrb/Dick's
Attn: Bankruptcy Dept.
Po Box 1400
El Paso, TX 79948

Gecrb/Gap
Attn: Bankruptcy Dept.
Po Box 981400
El Paso, TX 79998

Home Depot
Attn: Bankruptcy Dept.
Po Box 6497
Sioux Falls, SD 57117

Kohls/Capone
Attn: Bankruptcy Dept.
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051

**Portfolio Recovery
Associates, LLC**
PO Box 41067
Norfolk VA 23541

**Quantum3 Group LLC as
agent for**
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

**Quantum3 Group LLC as
agent for**

World Financial Network
Bank
PO Box 788
Kirkland, WA 98083-0788

Sears/CBNA

Attn: Bankruptcy Dept.
Po Box 6282
Sioux Falls, SD 57117

State Collection Service

Attn: Bankruptcy Dept.
2509 S Stoughton Rd
Madison, WI 53716

Transunion

Attn: Bankruptcy Dept.
PO Box 1000
Chester, PA 19022

VW Credit INC

Attn: Bankruptcy Dept.
1401 Franklin Blvd
Libertyville, IL 60048

VW Credit, Inc.

9441 LBJ Freeway, Suite 350
Dallas, Texas 75243

Wells Fargo

Attn: Bankruptcy Dept.
Po Box 94498
Las Vegas, NV 89193

Wells Fargo Bank NA

PO Box 10438
Des Moines IA 50306-0438

WFNNB/Victoria's Secret

Attn: Bankruptcy Dept.
Po Box 182789
Columbus, OH 43218

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